

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**NICOLE JENNINGS WADE,  
JONATHAN D. GRUNBERG, and  
G. TAYLOR WILSON,**

**Plaintiffs,**

**vs.**

**L. LIN WOOD,**

**Defendant.**

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**CASE NO: 1:22-cv-01073-AT**

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**MOTION TO STAY**

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**COMES NOW**, GEORGIA FARM BUREAU MUTUAL INSURANCE COMPANY (“GFB”), Interested Party in the above-captioned case, and hereby files this Motion for Stay of Proceedings, respectfully showing this Court as follows:

1.

GFB is the Plaintiff in a declaratory judgment action filed against Plaintiffs Nicole Jennings Wade, Jonathan D. Grunberg, G. Taylor Wilson, and Defendant L. Lin Wood designated as Civil Action File No. 2022CV365689 in the Superior Court of Fulton County, Georgia.

2.

The purpose of the declaratory judgment action is to determine GFB’s rights and obligations under the policies of insurance issued to Defendant L. Lin Wood with respect to the allegations raised by Nicole Jennings Wade, Jonathan D. Grunberg, G. Taylor Wilson in the present action.

3.

In the present case, GFB is providing a defense to Defendant L. Lin Wood pursuant to a reservation of rights.

4.

GFB hereby respectfully requests this Court stay the proceedings in Civil Action No. Civ. Action 1:22-cv-01073-AT, *Nicole Jennings Wade, Jonathan D. Grunberg, and G. Taylor Wilson v. L. Lin Wood* until the time that the Fulton County Superior Court has an opportunity to rule on GFB's declaratory judgment action. Otherwise, GFB will be in a position of having to continue providing a defense to Defendant L. Lin Wood and incurring costs associated therewith until it is determined as a matter of law whether GFB has an obligation to do so.

**WHEREFORE**, for the within and foregoing reasons, GFB respectfully requests this Court stay the proceedings in Civil Action No. Civ. Action 1:22-cv-01073-AT until the Fulton County Superior Court rules on GFB's declaratory judgment action designated as Civil Action File No. 2022CV365689.

Respectfully submitted this 7th day of June, 2022.

*[Signature to follow on next page]*

/s/ Duke R. Groover

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**CERTIFICATE OF SERVICE**

This is to certify that I have this date served a copy of the foregoing *Motion for Stay* by depositing a copy of the same in the United States Mail, postage prepaid, and properly addressed to ensure delivery to:

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Respectfully submitted this 7th day of June, 2022.

/s/ Duke R. Groover  
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